



January 28, 2011

Dr. Kristina Thayer
NTP/ CERHR, NIEHS
P.O. Box 12233
MD K2-04
Research Triangle Park, NC 27709

RE: NIEHS/ NTP Workshop on Role of Environmental Chemicals in the Development of Diabetes and Obesity held January 11-13, 2011

Dear Dr. Thayer:

We appreciated the opportunity to attend the recent NIEHS/ NTP Workshop on the Role of Environmental Chemicals in the Development of Diabetes and Obesity and congratulate you on its planning and execution. The research priorities workshop allowed attendees an opportunity to evaluate the current state of the science with regard to the potential associations between exposure to certain chemicals (or chemical classes) and diabetes and obesity. There is increasing interest in the hypothesis that environmental chemicals may be contributing factors to the epidemics of diabetes and obesity both in the United States and globally. CropLife America would like to offer the following comments for your consideration as you prepare the planned monograph.

CropLife America (CLA) is a not-for-profit trade organization representing the nation's developers, manufacturers, formulators and distributors of plant science solutions for agriculture and pest management in the United States. Our member companies produce, sell and distribute virtually all the crop protection technology products used by American farmers and other consumers. We are committed to the safe and responsible use of the industry's products in order to provide safe and abundant food, as well as for the control of insect and plant disease vectors for the protection of human health, all providing valuable benefits back to the consumer.

First, while our affiliated scientists were able to attend the meeting, we were disappointed that they were not officially invited participants of the multiple break-out groups. This is problematic when we note that scientists from two non-governmental organizations (NGOs) were invited participants: Institute for Agriculture and Trade Policy and National Resources Defense Council. For full transparency, industry should have been afforded the same privileges that the NGOs were granted with a seat at the table to share the vast knowledge we have with these compounds. Without being an officially invited participant, industry could not freely interject into the conversation. We believe that a more productive collaboration is encouraged when scientists from government, academia,

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industry, and NGOs are afforded an opportunity to discuss scientific information. Scientists from our member companies are uniquely familiar with the chemistry and toxicology of their compounds and could have provided valuable insight to develop a more focused research agenda.

Further, we feel it is important that leading research experts in diet, nutrition, physical activity and lifestyle aspects of obesity and diabetes also be engaged in this important public health conversation. We understand the purpose of the NTP research workshop was to focus on the scientific understanding of the potential contributions from environmental chemicals; however, the significant roles of diet and exercise are essential when evaluating the public health implications of obesity and diabetes. Additionally, we would encourage the NTP to ensure that research funding requests include specific information on diet and exercise, especially proposals for observational epidemiologic studies for which diet and exercise factors are important confounders of potential environmental chemical exposures.

Lastly, while the workshop was a valuable venue for the discussion of the latest science and for the development of novel hypotheses to be tested, we note that hypothesized associations should not become *de facto* policy. Specifically, we urge NIEHS and NTP to be appropriately cautious in their language as to not produce undue public concern regarding this sensitive health topic and to be clear that any environmental chemicals selected for further evaluation are not *a priori* labeled 'obesogens', but are being assessed for this hypothetical mechanism.

We stand ready to assist with the review and editing of the NTP monograph. To that end and most importantly, we are especially interested in learning more about the process for developing and finalizing the monograph. Thank you in advance for providing this further clarification.

Please contact me at wjones@croplifeamerica.org or at 202-296-1585 if you have any questions.

Sincerely,

Wendelyn Jones, Ph.D.
Senior Director, Human Health Policy
CropLife America